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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.622(b),) RM-
Digital Television Table of Allotments,)
(Hartford, Connecticut))

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To: Chief, Video Services Division, Mass Media Bureau

FOX TELEVISION STATIONS, INC.
PETITION FOR RULEMAKING

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Summary

Fox Television Stations, Inc. ("Fox") hereby requests that the Commission amend the Table of Allotments for Digital Television ("DTV") stations by allotting DTV channel 31 to Station WTIC-TV, Hartford, Connecticut in lieu of DTV channel 5. As currently allocated, DTV channel 5 in Hartford, Connecticut will, among other things, result in harmful interference to over 1.1 million people in the congested northeast, including almost 900,000 people who are currently served by Fox's NTSC channel 5 station, WNYW(TV), New York, New York. Since the DTV Proceeding, Fox has been searching for a reasonable solution to this unfavorable allocation. Recently, Fox determined that substituting DTV channel 31 for DTV channel 5 in Hartford, together with other minor changes to WTIC-DT, Hartford, Connecticut, and collocation of WEDH-DT (DTV channel 32 in Hartford) with WTIC-DT, provides such a solution.

The instant proposal has multiple benefits. Most importantly, it will cure the potential interference to over 1.1 million people and will result in a significant net gain in the number of persons who will be able to receive interference-free television service in the congested northeastern United States. In addition, the proposal will increase WTIC-DT's current NTSC service area replication, improve the currently severe short-spacing problems that exist with DTV channel 5, and minimize new interference to adjacent channel and co-channel DTV and NTSC

stations. Accordingly, Commission grant of the instant Petition is in the public interest.

In the Matter of)
)
 Amendment of Section 73.622(b),) RM-
 Digital Television Table of Allotments,)
 (Hartford, Connecticut))

Fox Television Stations, Inc. ("Fox"), by its attorneys and pursuant to sections 1.401 and 73.623 of the Commission's rules, 47 C.F.R. §§ 1.401 and 73.623, hereby requests that the Commission amend the Table of Allotments for Digital Television ("DTV") stations, section 73.622(b) of the Commission's rules, 47 C.F.R. § 73.622(b), by allotting DTV channel 31 to Station WTIC-TV, Hartford, Connecticut in lieu of DTV channel 5 and approving other related changes to WTIC-DT and WEDH-DT, Hartford, Connecticut, as discussed in detail in the attached Engineering Statement prepared by R. Evans Wetmore, P.E. and Mike Radford of Fox ("Engineering Statement"). The instant proposal will result in a significant net gain in the number of persons who will be able to receive interference-free television service in the congested northeastern United States.

I. Background

Fox is the licensee of station WNYW(TV), NTSC channel 5 in New York, New York. In the Sixth Report and Order in the digital television proceeding ("DTV Proceeding"),¹ the Commission allotted DTV channel 5 to WTIC-TV,² licensed to Tribune Television Company ("Tribune").³ The allocation of DTV channel 5 in Hartford, Connecticut was not optimum for several reasons.

First, Fox will suffer substantial harm as a result of the DTV channel 5 allocation in Hartford. As the Engineering Statement demonstrates, the allocation of DTV channel 5 in Hartford will result in interference to over 1.1 million people in the northeast corridor, including nearly 900,000 people covered by WNYW(TV), NTSC channel 5 in New York, New York. This represents nearly 5% of the persons currently covered by Fox's NTSC signal in New York, New York.

Second, the allocation of DTV channel 5 in Hartford falls far short of the minimum geographic spacing limits that the Commission itself established for

¹ Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Report and Order, 12 FCC Rcd 14588 (1997) ("Sixth Report and Order"), recon. granted in part, 13 FCC Rcd 7418 (1998) ("Reconsideration Order").

² WTIC-TV serves Hartford, Connecticut on NTSC channel 61.

³ As stated in the attached letter, Tribune supports the instant proposal to substitute DTV channel 31 for channel 5 in Hartford. See Letter dated October 18, 2000, from Thomas P. Van Wazer to Barbara Kreisman attached hereto as Attachment B.

making additions or modifications to the DTV Table of Allotments. Under Section 73.623(d)(2), a proposed DTV VHF channel in Zone I must be at least 244.6 km (152 miles) from any co-channel DTV or NTSC station. As originally allocated, however, DTV channel 5 in Hartford is only 147.9 km from WNYW(TV), and is also materially short-spaced to WCVB(TV), NTSC channel 5 in Boston.⁴ As reflected in the Engineering Statement, these significant short-spacings will result in substantial interference to the television coverage to over 1.1 million persons in the northeast.

Third, the allocation of DTV channel 5 places Tribune's WTIC-TV in a worse situation than its competitors in the Hartford-New Haven market. WTIC-TV has seven commercial broadcast station competitors in the Hartford-New Haven market, two VHF stations (NTSC channels 3 and 8) and five UHF stations (NTSC channels 18, 20, 26, 30, and 59). All but two of these stations have received DTV allocations which result in replication of at least 90% of their respective NTSC service areas. Moreover, the two stations that have received less than 90% replication have benefitted by receiving new interference to less than 1% of their NTSC service area populations (i.e., a relatively low PERCENTLOSS) during the DTV transition period. With the DTV channel 5 allocation, however, WTIC-TV not only

⁴ See Petition for Reconsideration filed by Fox Television Stations, Inc., MM Docket No. 87-268, at 6 (filed June 12, 1997).

received a mere 86.5% service area replication, but WTIC-TV also will lose 10.7% of its NTSC service area population due to new interference during the DTV transition period.⁵ In short, the DTV channel 5 allocation in Hartford will put Tribune at a disadvantage to its competitors in the Hartford-New Haven television market.

On June 12, 1997, Fox submitted a Petition for Reconsideration of the Sixth Report and Order in the DTV Proceeding. In its petition, Fox proposed, among other things, to change WTIC-TV's DTV assignment from channel 5 to channel 16, 28, 35, 44, 60, or 63. At that time, Tribune supported a regional solution proposed by the Association for Maximum Service Television, Inc. ("MSTV") in order to reduce short-spacings, and opposed any regional solution that addressed only the WTIC-TV DTV allocation in Hartford. The Commission denied Fox's proposed alternative allotments contained in its Petition for Reconsideration.⁶

On August 3, 1998, Tribune filed an application for a construction permit for DTV operation of WTIC-DT on channel 5.⁷ In its DTV Application,

⁵ WTIC-TV is one of only 15 television stations in the nation whose PERCENTLOSS resulting from the allocation exceeds 10 percent. While another Hartford area station, WVIT(TV) (NTSC channel 30, New Britain, Connecticut) also has a PERCENTLOSS above 10%, WVIT benefits in the long run by a DTV channel allocation that replicates 96.1% of its NTSC service area.

⁶ See Reconsideration Order, 13 FCC Rcd 7418, 7579, paras. 516-17.

⁷ See Application for Digital Construction Permit, Station WTIC-DT, Hartford, (continued...)

Tribune proposed to construct the WTIC-DT facility at a location approximately 0.24 kilometers (km) northeast of the current WTIC-TV site. The Commission granted the DTV Application on March 3, 1999. On October 5, 1999 Tribune filed a request to extend the WTIC-DT construction deadline because Tribune was unable to complete DTV construction at the proposed site due to local zoning problems that were experienced by the proposed new tower's owner.⁸ On May 4, 2000 Tribune filed a request for an additional six-month extension of the DTV construction permit; the Commission granted Tribune's most recent extension request for a six-month period expiring on November 1, 2000.⁹

Fox has continued to search for solutions to the sub-optimum DTV channel 5 allotment, and recently determined that DTV channel 31 would be a viable substitute for DTV channel 5 in Hartford if channel 31 is operated directionally. As

⁷ (...continued)
Connecticut, File No. BPCDT-980803KN (filed Aug. 3, 1998) ("DTV Application"), granted Mar. 3, 1999.

⁸ See Letter from Thomas P. Van Wazer, Sidley & Austin, to Ms. Magalie Roman Salas, Secretary, Federal Communications Commission (dated Oct. 5, 1999). The Commission granted Tribune's extension request on December 15, 1999 for a six-month period expiring on May 1, 2000. See Letter from Clay C. Pendarvis, Chief, Television Branch to Thomas P. Van Wazer, Esq., Sidley & Austin (dated Dec. 15, 1999).

⁹ See Letter from Thomas P. Van Wazer, Sidley & Austin, to Ms. Magalie Roman Salas, Secretary, Federal Communications Commission (dated May 4, 2000).

demonstrated below and by the attached Engineering Statement, use of DTV channel 31 in Hartford rather than channel 5 will result in a significant net increase of more than 720,000 people who will be covered by television service in the northeast. Furthermore, by operating on DTV channel 31 with a directional DTV antenna, Tribune will be able to achieve greater service area replication than it could achieve operating on DTV channel 5 using a non-directional antenna. Accordingly, the instant proposal will serve the public interest by minimizing interference and by achieving a substantial net gain in interference-free television coverage.

II. Allotment of DTV Channel 31 in Hartford in Place of Channel 5 Will Result in a Net Increase in the Number of People Who Will Be Able to Receive Interference-Free Television Service.

The instant proposal will result in a net increase in the number of people in the northeast corridor who will be able to receive interference-free television service. In the DTV Proceeding, the Commission recognized that the New York-Connecticut region is particularly congested and that some of the DTV allotments in that area are less than ideal.¹⁰ In fact, to reduce potential DTV-to-DTV adjacent channel interference in that area, the Commission agreed to change the DTV allotment for Hartford station WFSB-TV from channel 11 to 33.¹¹ Fox's proposal

¹⁰ See Reconsideration Order, 13 FCC Rcd 7418, 7523, para. 309.

¹¹ See id.

will accomplish even more than the WFSB-TV allotment change. As shown by the Engineering Statement, substituting DTV channel 31 for channel 5 in Hartford not only will help to alleviate DTV-to-DTV interference, it also will eradicate a significant amount of potentially harmful DTV-to-NTSC interference, thereby increasing television coverage to over 1.1 million people.

Specifically, the Engineering Statement demonstrates that if Tribune operates on DTV channel 5 in Hartford, such operation would interfere with the television coverage to 1,112,403 people. DTV operation on channel 5 in Hartford will cause interference to 1,017,458 people potentially capable of receiving NTSC coverage, and to 94,945 people potentially capable of receiving DTV coverage. Thus, if DTV channel 5 is removed from the DTV Table in Hartford, over 1.1 million additional people will receive interference-free television coverage.

In addition, the Engineering Statement indicates that, assuming that WEDH-DT (DTV channel 32 in Hartford) is collocated with WTIC-DT (DTV channel 31 in Hartford),¹² the proposed change would subject only 388,910 people to interference. Specifically, only 302,551 people would receive interference to NTSC service, and only 86,359 people would receive interference to DTV service. Thus, allotting DTV channel 31 in Hartford in place of channel 5 would result in a net

¹² The effect of relocating WEDH-TV (DTV channel 32 in Hartford) is discussed in Appendix A to the Engineering Statement.

increase of 723,493 people who would receive television coverage. More precisely, if Tribune operates on DTV channel 31 using a directional antenna, 714,907 additional people would receive NTSC coverage, and 8,586 additional people would receive DTV coverage than if Tribune operated on DTV channel 5.

The allocation proposed herein thus will result in a net gain in television service free from interference as well as a net reduction in the amount of interference caused to other stations in the highly congested northeast corridor. Such enormous benefits clearly are in the public interest.¹³

¹³ The Communications Act of 1934, as amended by the Community Broadcasters Protection Act of 1999, provides that allotment changes necessary to resolve technical problems encountered in the transition to full-power digital television take precedence over Class A television stations. See 47 U.S.C. § 336(f)(1)(D). Because the proposed change in WTIC-DT's channel assignment would reduce interference to Fox's owned-and-operated station WNYW(TV), New York, New York, would increase WTIC-DT's service area replication, and would improve short-spacing problems that currently exist, the proposed allotment change is unquestionably a reasonable engineering solution to correct technical problems encountered in the transition to digital television. The proposed allotment change thus falls within the exception to the protection of Class A facilities. See Establishment of a Class A Television Service, MM Docket No. 00-10, Report and Order, 15 FCC Rcd 6355, paras. 62-64 (2000). Accordingly, the Engineering Statement does not include an analysis of predicted interference to Class A facilities.

III. Allocating DTV Channel 31 to Hartford in Place of Channel 5 will Increase WTIC's Service Area Replication.

The instant proposal further serves the public interest as DTV channel 31 will replicate a greater portion of WTIC-TV's NTSC service area than DTV channel 5. As allocated, DTV channel 5 will replicate only 86.5% of the WTIC-TV NTSC service area. By operating on DTV channel 31 in Hartford using a directional antenna and by increasing the station's effective radiated power (ERP) to 600kW, Tribune will be able to provide DTV service to over 23,415 square kilometers, replicating 90.0% of WTIC-TV's NTSC service area. This result is consistent with the Commission's goals of providing service area replication and maximization – that is, providing broadcasters with a DTV allotment that will enable them to offer DTV coverage to an area comparable to the broadcaster's existing NTSC service area and eliminating the disparity between UHF and VHF stations in the digital paradigm.¹⁴

IV. Allotting DTV Channel 31 in Place of DTV Channel 5 in Hartford Will Serve the Public Interest By Resulting in a Net Reduction in Harmful Interference and a Net Gain in Television Coverage in the Northeast.

The Engineering Statement demonstrates that the proposed DTV channel substitution will serve the public interest by achieving both a reduction in harmful interference to over 1.1 million people as well as a net increase in television coverage to more than 720,000 people in the northeastern United States. As required

¹⁴ See Sixth Report and Order, at 14681-14682, para. 206.

by section 73.623(c)(2), the instant proposal will not result in more than a 2% increase in new interference to the population served by any other DTV station, DTV allotment or analog television broadcast station. The substitution of DTV channel 31 at Hartford also will comply with the principal community coverage requirements of sections 73.625(a) and 73.623(c)(1) of the Commission's rules.¹⁵

Moreover, the proposed substitution neither will cause any affected station to receive interference in excess of 10% of its population, nor will it, with one minor exception, result in interference to any station that receives interference to 10% or more of its covered population.¹⁶ As a result of the instant proposal, station WVIT(TV), NTSC channel 30, New Britain, Connecticut will experience minimal new interference of 0.05% of its baseline populations, increasing the PERCENTLOSS of WVIT from 13.2 to 13.3 percent. To the extent that such a negligible increase does not meet the *de minimis* standards under the Commission's rules, the Commission has good cause to waive its rules in this case.

First, as demonstrated in the Engineering Statement, substituting DTV channel 31 for channel 5 in Hartford will result in a net gain of over 720,000 more

¹⁵ See 47 C.F.R. §§ 73.625(a), 73.623(c)(1).

¹⁶ The Commission's rules state that "no new interference may be caused to any station that already experiences interference to 10 percent or more of its population." 47 C.F.R. § 73.623(c)(2).

people in the northeast who will be covered by interference-free television service. In contrast, only 2,329 people covered by WVIT – representing 0.05% of the total baseline coverage of WVIT – will be subject to new interference by the instant proposal. Second, the minimal inconvenience to WVIT's NTSC coverage will be only temporary, as DTV-to-NTSC interference should cease to exist following the DTV transition period. Thus, the Commission has ample basis to waive its rules in this case if necessary. Substituting DTV channel 31 in Hartford in place of DTV channel 5 clearly is in the public interest as it will help to minimize harmful interference in the congested northeast and will result in a net gain in television coverage to more than 720,000 people.

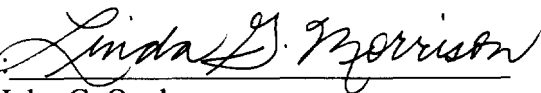
V. Conclusion

Accordingly, Fox respectfully requests that the Commission grant the instant petition and initiate a rulemaking to amend the DTV Table of Allotments by allotting DTV channel 31 at Hartford, Connecticut in place of DTV channel 5.

Furthermore, should the Commission find that a waiver of its rules is required by the instant proposal, Fox hereby respectfully requests that the Commission grant such a waiver.

Respectfully submitted,

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CERTIFICATE OF SERVICE

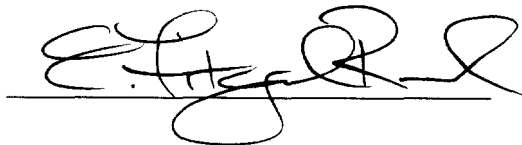
I, Eric Reed, hereby certify that on this 20th day of October, 2000, a copy of the preceding Petition for Rulemaking of Fox Television Stations, Inc. was served by first class mail on the following:

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A handwritten signature in black ink, appearing to read "E. Reed", is written over a horizontal line.

ATTACHMENT A
ENGINEERING STATEMENT

Engineering Showing in Support of Channel Change of WTIC-DT in Hartford, CT

In the FCC Table of Allotments for DTV, WTIC in Hartford, CT was assigned channel 5 at an ERP of 1 kW. This exhibit demonstrates that the following changes to both WTIC-DT and to WEDH-DT, DTV channel 32 in Hartford, CT:

WTIC-DT:	Channel 5	→	Channel 31
	1 kW ERP	→	600 kW ERP
	618.5 meters COR	→	591 meters COR
	Allotted Antenna Pattern	→	See Figure 1
WEDH-DT:	41° 46' 27" N	→	41° 42' 13" N
	72° 48' 20" W	→	72° 49' 57" W
	359 meters COR	→	591 meters COR
	Allotted Antenna Pattern	→	See Figure 1

will conform to FCC Regulations.

Methodology

All studies that follow were performed using the FCC Longley-Rice propagation software. The column labeled "Baseline" represents the BASELINE value as described in the DTV Processing Guidelines. The column labeled "New IX" represents the new population affected by the change, while "(%) IX" represents this value as a percentage of the baseline.

The columns labeled "DTVSEV" and "PERCENTLOSS" are the same as those described in the DTV Processing Guidelines.

Analysis

First a study was run to determine the effect of removing channel 5 from the Hartford area. The following table shows the results of such an analysis. The interference values are negative as they represent interference that would no longer be present. A total of 1,112,403 people who would have been interfered with, would now receive valid coverage.

Call	Ch St City	Baseline	New IX	(%) IX
WBNE-DT	6A CT NEW HAVEN	4,424,000	-94,945	-2.15
WTTG	5N DC WASHINGTON	6,843,035	0	0.00
WCVB	5N MA BOSTON	7,002,983	-121,534	-1.74

WLNE	6N MA NEW BEDFORD	5,486,662	0	0.00
WABI	5N ME BANGOR	491,741	0	0.00
WCSH	6N ME PORTLAND	1,580,484	0	0.00
WNYW	5N NY NEW YORK	18,666,308	-895,924	-4.80
WPTZ	5N NY NORTH POLE	542,050	0	0.00
WRGB	6N NY SCHENECTADY	1,684,738	0	0.00
WTVH	5N NY SYRACUSE	1,544,574	0	0.00
WPVI	6N PA PHILADELPHIA	9,564,387	0	0.00

Total New Interference: -1,112,403

Next, a study was preformed to determine the effect of introducing WTIC-DT on channel 31 in the Hartford area. The following table depicts new interference as a result of WTIC-DT moving to channel 31. This study assumes that the DTV facilities of WEDH-DT channel 32 in Hartford are moved to the same site as WTIC-DT (See Appendix A). A total of 388,910 new people would be interfered with in this case. This represents approximately one third of the total population lost to interference with WTIC-DT operating on channel 5.

Call	Ch	St	City	Baseline	New IX	%IX	DTVSERV	PERCENTLOSS
WEDH	24N	CT	HARTFORD	3,009,464	0	0.00		11.0
WEDH-DT	32A	CT	HARTFORD	3,207,174	0	0.00	112.4	
WVIT	30N	CT	NEW BRITAIN	4,345,134	2,329	0.05		13.3
WTGI-DT	31A	DE	WILMINGTON	5,337,416	0	0.00	100.0	
WBZ-DT	30A	MA	BOSTON	6,716,000	13	0.00	99.6	
WFXT-DT	31A	MA	BOSTON	6,228,918	85,649	1.38	101.5	
WSBK	38N	MA	BOSTON	6,316,042	0	0.00		3.9
WABU-DT	32A	MA	BOSTON	4,583,000	0	0.00	92.1	
WLWC	28N	MA	NEW BEDFORD	4,113,685	0	0.00		0.1
WUNI	27N	MA	WORCESTER	6,770,869	0	0.00		0.0
WWLA	35N	ME	LEWISTON	483,179	0	0.00		1.1
WNJS	23N	NJ	CAMDEN	6,120,065	0	0.00		4.0
WXXA	23N	NY	ALBANY	1,343,837	0	0.00		0.9
WMGC	34N	NY	BINGHAMTON	704,486	0	0.00		0.1
NEW	34N	NY	LAKE PLACID	28,646	0	0.00		0.0
WBIS	31N	NY	NEW YORK	16,860,777	290,960	1.73		3.7
WBIS-DT	30A	NY	NEW YORK	16,434,000	0	0.00	98.6	
WUHF	31N	NY	ROCHESTER	1,023,129	0	0.00		0.0
WMHT	17N	NY	SCHENECTADY	1,331,542	0	0.00		0.7
WCNY	24N	NY	SYRACUSE	1,379,573	0	0.00		0.6
WFXV	33N	NY	UTICA	775,089	0	0.00		7.0
WLVT	39N	PA	ALLENTOWN	2,858,785	0	0.00		11.9
WPHL	17N	PA	PHILADELPH	7,209,334	0	0.00		0.4
WTFX	29N	PA	PHILADELPH	7,937,531	0	0.00		10.0
WYBE	35N	PA	PHILADELPH	5,733,637	0	0.00		1.6
WNEP	16N	PA	SCRANTON	1,934,667	0	0.00		0.5
WOLF	38N	PA	SCRANTON	1,141,754	0	0.00		3.2
WOLF-DT	31A	PA	SCRANTON	854,719	697	0.08	99.9	
WBRE	28N	PA	WILKES-BARRE	2,281,016	0	0.00		9.6
WETK	33N	VT	BURLINGTON	527,294	0	0.00		0.3
WNNE	31N	VT	HARTFORD	656,529	9,262	1.41		3.7
WVER	28N	VT	RUTLAND	359,274	0	0.00		0.0

Total New Interference: 388,910

In all cases above, the new interference represents less than 2% of the total served population, thus the 2% *de minimis* rule is satisfied. In all cases of DTV interference, the DTVSERVICE is never below 90%, thus the 10% *de minimis* rule for DTV interference is satisfied. In all but one case of NTSC interference, the PERCENTLOSS is less than 10% thus the 10% *de minimis* rule for NTSC interference is satisfied. The exception is WVIT, channel 30 in New Britain; however, this slight increase in interference is offset by the overwhelming drop in interference elsewhere.

Conclusion

The above demonstrate that this proposal is consistent with FCC policy of maximization of DTV Service Area. In addition, such a channel change would reduce the total population lost to interference from 1,112,403 to 388,910. This proposal thus represents significant improvement in both DTV and NTSC service in the Hartford area.

Appendix A

Relocation of DTV 32 in Hartford, CT

A study was done to determine the effect of relocating DTV channel 32 in Hartford, CT. The collocation of WEDH-DT (DTV channel 32 in Hartford, CT) with WTIC-DT (DTV channel 31 in Hartford, CT) would result in the following changes to WEDH-DT:

41° 46' 27" N	→	41° 42' 13" N
72° 48' 20" W	→	72° 49' 57" W
359 meters COR	→	591 meters COR
Allotted Pattern	→	See Figure 1

The following stations were identified as potential recipients of new interference resulting from the relocation of DTV channel 32:

Call	City	Type	Ch	Mech	Dist
WFSB-DT	Hartford, CT	DTV	33	N-1	8.2 km
WHCT	Hartford, CT	NTSC	18	N+14	8.3 km
WVIT	New Britain, CT	NTSC	30	N+2	0.3 km
WHMM	Washington, DC	NTSC	32	N	472.6 km
WFXT	Boston, MA	NTSC	25	N+7	148.9 km
WFXT-DT	Boston, MA	DTV	31	N+1	148.9 km
WABU-DT	Boston, MA	DTV	32	N	161.1 km
WLWC	New Bedford, MA	NTSC	28	N+4	158.0 km
WGGB	Springfield, MA	NTSC	40	N-8	61.6 km
WWLA	Lewiston, ME	NTSC	35	N-3	314.0 km
WNBU-DT	Concord, NH	DTV	33	N-1	205.9 km
WMGC	Binghamton, NY	NTSC	34	N-2	260.3 km
WICZ	Binghamton, NY	NTSC	40	N-8	260.3 km
NEW	Lake Placid, NY	NTSC	34	N-2	299.9 km
WPIX-DT	New York, NY	DTV	33	N-1	147.9 km
WNYE	New York, NY	NTSC	25	N+7	143.3 km
WBIS	New York, NY	NTSC	31	N+1	147.9 km
WMHT	Schenectady, NY	NTSC	17	N+15	141.4 km
WCNY	Syracuse, NY	NTSC	24	N+8	296.1 km
WFXV	Utica, NY	NTSC	33	N-1	260.5 km
WLVT	Allentown, PA	NTSC	39	N-7	251.7 km
WPHL	Philadelphia, PA	NTSC	17	N+15	273.8 km
WTXF	Philadelphia, PA	NTSC	29	N+3	273.8 km
WYBE	Philadelphia, PA	NTSC	35	N-3	273.8 km
WPSG-DT	Philadelphia, PA	DTV	32	N	273.8 km
WSWB-DT	Scranton, PA	DTV	32	N	242.2 km
WBRE	Wilkes-Barre, PA	NTSC	28	N+4	259.2 km
WSBE	Providence, RI	NTSC	36	N-4	113.2 km
WETK	Burlington, VT	NTSC	33	N-1	313.4 km
WETK-DT	Burlington, VT	DTV	32	N	313.4 km
WNNE	Hartford, VT	NTSC	31	N+1	195.7 km
WVER	Rutland, VT	NTSC	28	N+4	218.3 km

None of the above stations experience new interference resulting from the changes in facilities of WEDH-DT.

ATTACHMENT B

SIDLEY & AUSTIN
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Room 2-A666
Washington, DC 20554

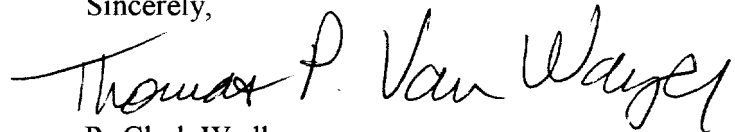
Re: Tribune Television Corporation
Licensee of WTIC-TV-DT, Hartford, Connecticut

Dear Ms. Kreisman:

Tribune Television Corporation ("Tribune Television"), licensee of WTIC-TV-DT, Hartford, Connecticut, by its undersigned attorneys, hereby confirms its support for a change in WTIC's DTV channel assignment from 5 to 31. This letter has been prepared to accompany a Petition for Rulemaking to be filed by Fox Television Stations, Inc. ("Fox") seeking to change WTIC's DTV assignment from 5 to 31.

Tribune Television stands ready to build out WTIC's DTV assignment as soon as the Commission acts on the above-referenced Fox Rulemaking Petition. Accordingly, Tribune Television urges the Commission to act on Fox's Rulemaking Petition as expeditiously as possible.

Sincerely,



R. Clark Wadlow
Thomas P. Van Wazer

Counsel for Tribune Television Corporation